

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KELLY LIBBY & HOOPES, P.C.,
and
GREENBERG TRAURIG LLP,

Plaintiffs,

Civil Action No. 05-11859 (RCL)

vs.

ULICO CASUALTY COMPANY,

Defendant.

**DEFENDANT'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR A TEN-DAY
EXTENSION TO FILE ITS ANSWER AND TO IMPLEAD ANY THIRD PARTIES**

Defendant Ulico Casualty Company (“Ulico”) respectfully submits this memorandum of law in support of its motion for a ten-day extension to file its answer and to implead any third parties.

On March 6, 2006, the Court ordered Ulico to file its answer and implead any third parties under Federal Rule of Civil Procedure 14, which is currently due on or before April 10, 2006. The plaintiffs and Ulico have been attempting to schedule discussions that might eliminate any need for Ulico to file an answer or to implead any third parties. Ulico respectfully requests, therefore, that the Court afford the parties an additional ten days, through April 20, 2006, to pursue these discussions before requiring Ulico to file its answer and implead any third parties. Alex D. Hardiman of Anderson Kill & Olick, P.C., counsel for plaintiffs, consents to the extension.

DEFENDANT'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR A TEN-DAY
EXTENSION TO FILE ITS ANSWER AND TO IMPLEAD ANY THIRD PARTIES

Dated: April 6, 2006

ULICO CASUALTY COMPANY,

By its attorneys,

/s/ Lon A. Berk

Lon A. Berk (BBO# 546835)
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CERTIFICATE OF SERVICE

I, Lon A. Berk, hereby certify that Defendant's Memorandum of Law in Support of Motion for a Ten-Day Extension to File Its Answer and to Implead any Third Parties was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Lon A. Berk

Lon A. Berk (BBO# 546835)